Coronavirus (COVID-19) Office Policy and Procedures

(16 August 2021)

Policy Statement

1. Purpose

i. The Information Commissioner continues to place the highest priority on the health, safety and wellbeing of the officers of the Information Commissioner's Office (ICO), as well as the wider community.

ii. The Information Commissioner and all officers of the ICO need to continue adhering to the COVID-19 public health guidelines released by the Ministry of Health and other COVID-19 guidelines or requirements issued by the Government, available at www.gov.bm/coronavirus.

iii. The ICO's procedures set out below actively support this policy and seek to mitigate the spread of COVID-19.

iv. The adoption of this written policy and supporting procedures memoralise the Information Commissioner's prior verbal and written instructions related to COVID-19.

v. Please also be aware and assured that the Information Commissioner will always treat your private health and personal data with high confidentiality and sensitivity.

Procedures

2. Purpose

i. The purpose of these procedures is to ensure that you:

a. are aware of the rules in place to sustain a healthy and safe workplace, while maintaining work productivity;

b. respond responsibly and transparently to these health precautions; and

c. are supported in this unique environment.

3. Scope

i. This policy applies to all ICO officers and consultants appointed by the Information Commissioner who physically work in our office.

ii. In response to the outbreak of COVID-19, the ICO is also providing the option for staff to work from home with prior approval from the Information Commissioner. It is strongly recommended that officers working from home adhere to this action plan as well, to ensure that we collectively and uniformly respond to this challenge.

iii. Terms such as "employees" or "staff" within this policy should be taken to include, whenever applicable, consultants, independent contractors, temporary staff and public officers alike (including those who are seconded to the Office).

iv. These procedures provide core COVID-19 workplace guidelines but do not reflect all relevant public health requirements provided by the Bermuda Government, e.g., school or day care guidelines, recreation guidelines, etc. The following Bermuda Government guidelines are reflected in these procedures:

a. Safe Return to Work After Travel Guidance (updated 24 June 2021)

b. Quick Guide to Return to Work After Travel Recommendations (updated 30 November 2020)

c. Coronavirus (COVID-19) Information for Travellers (website updated regularly)

d. Frequently Asked Questions for Public Officers (Employees) (updated 15 April 2021)

4. This coronavirus (COVID-19) office policy is subject to changes with the introduction of additional governmental guidelines. If so, the ICO will update you as soon as possible by email and future updates to the Bermuda Government guidelines are deemed to be incorporated into this policy. However, all other obligations, responsibilities, and entitlements set out in the following documents remain unchanged:

i. Government of Bermuda Conditions of Employment and Code of Conduct ("CECC")

ii. Collective Bargaining Agreement Between the Bermuda Government and the Bermuda Public Service Union ("CBA")

iii. The Bermuda Government Financial Instructions ("FI")

5. Additional Resources

i. Additional resources and documents for further COVID-19 guidelines and information include the following:

a. Bermuda Government website: https://www.gov.bm/coronavirus

b. Ministry of Health Headquarters:

1. Hours of operation – 9:00am – 9:00pm

2. (441) 444-2498

6. Specific questions regarding the applicability of a particular policy, practice or other considerations that relate to this Policy, should be addressed to the Information Commissioner.

7. Required Actions

i. Officers should take the required actions outlined below to protect themselves and their co-workers from a potential coronavirus infection. All communications to notify the ICO of sick and/or leave absences, as well as to provide applicable PCR COVID-19 test results or notifications of release from quarantine orders from the Ministry of Health, must be forwarded to the Information Commissioner.

8. Sick leave arrangements

i. If you have cold symptoms, such as cough/sneezing/fever, or feel poorly, request sick leave. If your symptoms are very mild, you may select to work from home with the prior approval of the Information Commissioner.

ii. If you have a positive COVID-19 diagnosis, you can return to the office only after you have fully recovered and with a medical officer or doctor's note confirming your negative PCR COVID-19 test. Results must be submitted to the Information Commissioner via email before your arrival to the office.

iii. Staff must notify the Information Commissioner of their absence due to sick leave as early as possible by email.

iv. Sick leave will be logged in the Vacation/Leave Tracking system accordingly.

9. Work from home requests

i. If you are feeling ill, but you are able to work, you can request to work from home if you can do so effectively and with the prior approval of the Information Commissioner.

ii. If you have recently returned from travelling, you must either work from home or take additional leave while adhering to the referenced Quarantine Requirements before you are allowed to return to the office.

iii. If you have been in close contact with someone exposed to COVID-19 but have not received a quarantine order from the Ministry of Health, please consider requesting to work from home. Please see guidance from the Ministry of Health on the meaning of 'close contact' and 'casual contact', https://www.gov.bm/sites/default/files/11758_Close_Contact_Infographic.pdf.

iv. If you're a parent and you have to stay at home with your child(ren) to conduct remote learning, you may request work from home if you can do so effectively.

v. If you need to provide care to a family member infected by COVID-19, you may request to work from home if you can do so effectively. You will only be permitted to return to the office 14 calendar days after your family member has fully recovered, and provided that you have a note from a medical officer or doctor confirming that you have a negative day-14 PCR COVID-19 test. Results must be submitted to the Information Commissioner via email before your arrival to the office.

vi. Staff who seek to arrange to work from home must notify the Information Commissioner by email for approval. Follow-up discussions will take place with you and the Information Commissioner regarding work expectations and related resources needed while working from home.

10. Quarantine orders from the Ministry of Health

i. If you are subject to a quarantine order from the Ministry of Health due to contact tracing, you must work remotely. You are required to comply with all directions from the Ministry of Health

during your quarantine. You may not return to work until the Ministry of Health notifies you that you are released from quarantine.

ii. If you are subject to a quarantine order and are unable to work from home or require modification of your work hours, Special Leave may be considered. Please discuss your circumstances with the Information Commissioner for agreement and approval for your work arrangements.

11. Travelling/commuting measures

i. All overseas travel related to work – both training and conferences – will be cancelled/postponed until further notice.

ii. In-person meetings, inclusive of external local training, should be done virtually where possible.

iii. If you normally commute to the office by public transportation and do not have other alternatives, you can request to work from home as a precaution if you are able to do so effectively.

12. Return to work protocols

i. The ICO and OPC have aligned their respective return to work protocols to safeguard the health and safety of our officers.

ii. At this time, any officer returning to work from their own overseas travel or who is in a household with visitors or other household members who have traveled overseas, shall return to work after:

a. providing the Information Commissioner with a Day 10 negative test, or

b. completing any longer quarantine period required by public health regulations and orders.

iii. Officers may work remotely during this period as long as they are able to do so effectively.

13. General hygiene rules

i. Wash your hands after using the toilet, before eating, and if you cough/sneeze into your hands (follow the 20-second hand-washing rule). You can also use the sanitizers you'll find around the office.

ii. Cough/sneeze into your sleeve, preferably into your elbow. If you use a tissue, discard it properly. Please contact the Office Manager if you need to replenish your supply of tissues.

iii. Wear your mask when travelling through the common areas of the office, such as the kitchen, copier room, board room, rest room, etc. Your mask can be removed once you are seated at your desk or boardroom table.

iv. Avoid touching your face, particularly eyes, nose, and mouth with your hands to prevent from getting infected.

v. If you find yourself coughing/sneezing on a regular basis, avoid close physical contact with your co-workers and take extra precautionary measures (such as requesting sick leave).